

*IN THE UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION AT GREENEVILLE*

IN RE:

LAKEWAY PUBLISHERS INC.

Case No. 2:19-bk-51163-MPP
Chapter 11

Debtor.

MOTION TO SELL PERSONAL PROPERTY OF THE DEBTOR IN POSESSION

NOTICE OF HEARING

Notice is hereby given that:

A hearing will be held on the Motion to Sell on July 30, at 9:00am, in the Bankruptcy Courtroom, Second Floor, James H. Quillen U.S. Courthouse located at 220 West Depot Street, Greeneville, TN..

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you wish to have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to grant the relief requested, you or your attorney must attend this hearing. If you do not attend this hearing, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

Lakeway Publishers, Inc. hereby moves the Court for authority to sell the personal property of the debtor known as identified on the attached Exhibit A free and clear of liens with liens attaching to the proceeds of sale. This sale is made by the Debtor in Possession pursuant to 11 U.S.C. §363(b), 11 U.S.C. § 1107, Fed. R. Bankr. P.2002, 6004, and E.D. Tenn. LBR 6004-1(a) and (b). The sale of the asset will be free and clear of any and all lien rights of creditors of the debtor with any such lien rights attaching to the proceeds of the sale. The Debtor in Possession is aware of only one consensual lien held by Pinnacle Bank for \$3,489,564.

The items to be sold by the Debtor in Possession are excess inventory of rolls of newsprint. The Debtor in Possession has received an offer of \$3,640.42 from the Cleveland Daily Banner. The Debtor in Possession believes that the assets are worth approximately \$3,000.00. No sales fees or auctioneer fees will be paid. Debtor intends to use the proceeds of the sale for continued business operations.

The claim bar date has not passed.

Respectfully submitted,

LAKEWAY PUBLISHERS, INC.

/s/ Ryan E. Jarrard

Ryan E. Jarrard, Esquire

BPR No. 024525

Attorney for Trustee

QUIST FITZPATRICK & JARRARD., PLLC

2121 First Tennessee Plaza

Knoxville, TN 37929-2121

865-524-1873

rej@qcflaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Joint Motion to Sell Free & Clear of Liens, and proposed Order have been served upon the indicated parties by placing a copy thereof in the U.S. Mail, first class postage prepaid, via email or ECF this June 25, 2019:

Tiffany DiIorio VIA US Mail
800 Market Street, Suite 114
Howard J. Baker Jr. US Courthouse
Knoxville, TN 37902

Pinnacle Bank
C/O Walt Winchester
Suite 1000, First Tennessee Plaza
800 South Gay Street
Knoxville, TN 37929
VIA CERTIFIED MAIL

All Parties in Interest on the attached index via US Mail

/s/ Ryan E. Jarrard

ATTORNEY